

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

ASSOCIATED RECOVERY, LLC,

*Plaintiff,*

Case No. 1:15-cv-01723-AJT-JFA

V.

JOHN DOES 1-44,

*Defendants in rem.*

In re:

744.COM	KXW.COM	UHW.COM	YJX.COM
028.COM	LNМ.COM	VCZ.COM	YLZ.COM
3DCAMERA.COM	LUOHE.COM	VGJ.COM	YQP.COM
FNY.COM	MEQ.COM	WYD.COM	YQT.COM
FX2.COM	OCU.COM	XAQ.COM	YRN.COM
FXF.COM	PIXIE.COM	XFF.COM	YTE.COM
JTZ.COM	QMH.COM	XSG.COM	YYG.COM
KGJ.COM	RUTEN.COM	YCX.COM	ZDP.COM
KMQ.COM	SDU.COM	YEY.COM	ZHD.COM
KOU.COM	SQG.COM	YGX.COM	ZULIN.COM
KXQ.COM	TAOLV.COM	YJR.COM	ZZM.COM

**DECLARATION OF ERIC Y. WU IN SUPPORT OF CERTAIN DEFENDANTS' REPLY  
TO PLAINTIFF'S OPPOSITION TO CERTAIN DEFENDANTS' MOTION TO  
DISMISS COMPLAINT FOR FAILURE TO JOIN A NECESSARY PARTY,  
OR IN THE ALTERNATIVE, TO TRANSFER VENUE**

I, Eric Y. Wu, declare as follows:

1. I am an attorney in the Washington, DC office of the law firm of Dentons US LLP, which represents certain of the domain names in this Action. I am a member of the Bar of the District of Columbia and the Bar of Virginia. I have personal knowledge of the matters stated in this declaration and would testify truthfully to them if called upon to do so.

2. Attached to this declaration as Exhibit I are true and correct copies of Motion of Plaintiff's Counsel to Withdraw, *Associated Recovery, LLC v. Butcher*, No. 2:16-cv-126 (E.D. Tex. Mar. 25, 2016), ECF No. 4 and Joint Declaration of Michael Halla and Steven Rinehart, *Associated Recovery, LLC v. Butcher*, No. 2:16-cv-126 (E.D. Tex. Mar. 25, 2016), ECF No. 4-4 .

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 11, 2016.



---

Eric Y. Wu